

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI**

In Re:)	
)	Case No. 22-60684-can11
DANIEL T. RAMSDELL)	(Jointly Administered)
)	Chapter 11
Debtors.)	

**DEBTORS SUPPLEMENTAL PRE-STATUS CONFERENCE REPORT REGARDING
EFFORTS UNDERTAKEN TO OBTAIN A CONSENSUAL PLAN OF REORGANIZATION**

Debtors previously filed Pre-Status Conference Reports regarding efforts to be undertaken to obtain a consensual Plan of Reorganization (Doc. No. 22 in each case). The Court scheduled a hearing on the status reports which was conducted on January 24, 2023. During the hearing, Debtors and Debtors counsel reported to the Court efforts they had undertaken to obtain a consensual Plan. One previous enumerated item included Debtors making a request for an informal opinion from the Missouri Bar regarding the release of information with respect to identity of current clients, case references, and other case information. At the prior hearing, the Debtors had not secured any informal opinions from the Missouri Bar but anticipated receiving the information in the future.

Debtors have now received a response from the Missouri Bar and specifically opinions regarding disclosure of client information that may also be available through search of public records, docket sheets, accident reports, case numbers, etc. The Missouri Bar referred the Debtors to two specific advisory opinions issued by the legal ethics counsel pursuant to Missouri Supreme Court Rule 5.30. The two opinions numbered 2015-02 and 2015-09 are attached hereto and incorporated herein by reference.

It is Debtors position that according to the opinions, the Debtors are prohibited from revealing confidential information without the client's consent and must oppose any order and assert all non-frivolous claims that the order is not authorized or that the information is protected by privilege.

Respectfully submitted,

DAVID SCHROEDER LAW OFFICES, P.C.

By: /s/ David E. Schroeder

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was served electronically to those parties who have entered an appearance in the Court's Electronic Court Filing (ECF) System and conventionally, via first-class mail, postage prepaid, to those parties who have requested notice but are not participating in the ECF System, pursuant to instructions appearing on the electronic filing receipt received from the U.S. Bankruptcy Court on this 14th day of February, 2023.

By: /s/ David E. Schroeder

David E. Schroeder

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